

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

GARY FRISCH, *et al.*, on behalf of themselves and all others similarly situated,

Plaintiffs,
v.

FCA US LLC,

Defendant.

Case No. 2:24-cv-10546-BRM-KGA

Hon. Brandy R. McMillion

Magistrate Judge Kimberly G. Altman

PLAINTIFFS' NOTICE REGARDING MOTION TO APPOINT INTERIM CO-LEAD COUNSEL [ECF NO. 31]

On January 3, 2025, Plaintiffs filed a Motion asking the Court to appoint their counsel as Interim Co-Lead Counsel pursuant to Fed. R. Civ. P. 23(g), and to apply that Order and appointment to any other case filed in or transferred to this District that involves the same subject matter and alleged defect as this lawsuit. ECF No. 31 (“Motion”). The Motion is fully briefed. *See* ECF Nos. 33, 34. In their Motion, Plaintiffs noted that one related action had already been filed as of that time, and that “the likelihood of additional cases being filed is high given the recent recall announcement and additional factual developments that continue to become public.” ECF No. 31, PageID.5147.

Plaintiffs file this Notice to update the Court that since Plaintiffs filed their Motion, at least three other related actions have been filed in federal courts regarding

the same subject matter and defect at issue in this case: *Paris v. FCA US, LLC*, Case No. 4:25-cv-10045 (E.D. Mich.) (complaint attached as **Ex. A** hereto) (this matter was voluntarily dismissed by the plaintiff following efforts by proposed Interim Co-Lead Counsel, as discussed ECF No. 34, PageID.5546); *Fishon v. Stellantis N.V. & FCA US LLC*, No. 2:25-cv-01233-NJC-LGD (E.D.N.Y.) (operative complaint attached as **Ex. B** hereto); and *Gandelman v. FCA US, LLC*, No. 2:25-cv-10605-BRM-KGA (E.D. Mich.) (operative complaint attached as **Ex. C** hereto). Plaintiffs respectfully submit that the filing of these additional cases, and the possibility that yet more related cases will be filed in and/or transferred to this District, reinforces the appropriateness of appointing Interim Co-Lead Counsel in this case to promote efficiency and protect the best interests of the proposed class. *See* Manual for Complex Litig. § 21.11 (4th ed. 2004).

DATED: April 16, 2025

Respectfully submitted,

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